

BRAFMAN & ASSOCIATES, P.C.

ATTORNEYS AT LAW

767 THIRD AVENUE, 26TH FLOOR

NEW YORK, NEW YORK 10017

TELEPHONE: (212) 750-7800

FACSIMILE: (212) 750-3906

E-MAIL: ATTORNEYS@BRAFLAW.COM

BENJAMIN BRAFMAN

MARK M. BAKER
OF COUNSEL

MARC A. AGNIFILO
OF COUNSEL

ZACH INTRATER
OF COUNSEL

ANDREA L. ZELLAN
JOSHUA D. KIRSHNER
JACOB KAPLAN
TENY R. GERAGOS
ADMITTED IN NY & CA
STUART GOLD

December 21, 2020

BY ECF

The Honorable Vernon S. Broderick
United States District Judge
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

Re: United States v. Ng Lap Seng, 15-cr-706-3 (VSB)

Dear Judge Broderick:

Counsel for Defendant Ng Lap Seng submit this letter to update the Court about the recent spike of confirmed COVID-19 cases at his facility, FCI Allenwood Low. Since December 15, 2020 (when counsel moved the Court to reconsider its May 2020 denial of compassionate release), the number of confirmed COVID-19 cases among FCI Allenwood Low inmates more than doubled, from 57 to 135. See <https://www.bop.gov/coronavirus/> (last updated Dec. 21, 2020).

For the reasons set forth above and in the emergency motion for reconsideration (ECF No. 974), the Court should reconsider its May 2020 opinion and order, reduce Ng's prison sentence to time served, and order his immediate release to ICE custody.

BRAFMAN & ASSOCIATES, P.C.

We again thank the Court for its courtesy in this matter.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Brafman', is written over a horizontal line.

Benjamin Brafman, Esq.
Jacob Kaplan, Esq.
Stuart Gold, Esq.
Brafman & Associates, P.C.
767 3rd Avenue, 26th Floor
New York, NY 10017
Tel: (212) 750-7800
Fax: (212) 750-3906
bbrafman@braflaw.com
jkaplan@braflaw.com
sgold@braflaw.com